

Baker & Hostetler LLP

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David J. Sheehan
Stacey A. Bell
Nicholas J. Cremona

Hearing Date: October 31, 2018
Time: 10:00 a.m.
Objections Due: October 17, 2018
Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY
PROCEEDINGS LISTED ON EXHIBIT A¹,

Defendants.

Adv. Pro. Nos. listed on Exhibit A

**NOTICE OF TRUSTEE'S MOTION
FOR LIMITED ADDITIONAL DISCOVERY BASED ON PRIOR
ORDERS AUTHORIZING DEPOSITION OF BERNARD L. MADOFF**

¹ See Exhibit A, Schedule of Remaining Good Faith Actions, annexed to the Trustee's Motion.

PLEASE TAKE NOTICE THAT, Irving H. Picard, as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa (“SIPA”), and the estate of Bernard L. Madoff (“Madoff”), by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on October 31, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard on Trustee’s Motion For Limited Additional Discovery Based On Prior Orders Authorizing Deposition Of Bernard L. Madoff (the “Motion”), as more particularly set forth in the Motion and the Declaration of David J. Sheehan in Support of the Motion (the “Sheehan Declaration”), annexed hereto.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **5:00 p.m. on October 17, 2018** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Stacey A. Bell; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 10, Washington, DC 20006 Attn: Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that the Trustee’s reply to the objections filed on or before October 17, 2018, must be in writing, shall conform to the Bankruptcy Rules and other applicable rules and orders of this Court, and shall be filed in accordance with General Rule M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern

District of New York (available at www.nysb.uscourts.gov) by no later than **October 24, 2018 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

Dated: New York, New York
September 21, 2018

/s/ Stacey A. Bell
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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Estate of Bernard L.
Madoff*

EXHIBIT A

	APN	Case Name	Counsel
1	10-04289	John Fujiwara, et al.	Lax & Neville, LLP
2	10-04292	Robert Roman	Chaitman LLP
3	10-04296	Jeffrey Shankman	Pro Se
4	10-04302	Joan Roman	Chaitman LLP
5	10-04305	David Shapiro, et al.	Klestadt Winters Jureller Southard & Stevens, LLP
6	10-04314	David Shapiro Nominee #3	Klestadt Winters Jureller Southard & Stevens, LLP
7	10-04321	Herbert Barbanel, et al.	Chaitman LLP
8	10-04325	David Shapiro Nominee #2	Klestadt Winters Jureller Southard & Stevens, LLP
9	10-04327	Gertrude E. Alpern Revocable Trust, et al.	Chaitman LLP
10	10-04328	David Shapiro Nominee	Klestadt Winters Jureller Southard & Stevens, LLP
11	10-04332	Barry Weisfeld	Dentons US LLP
12	10-04341	Marden, et al.	Pryor Cashman LLP
13	10-04343	Patrice Auld, et al.	Pryor Cashman LLP
14	10-04348	Marden Family Limited Partnership, et al.	Pryor Cashman LLP
15	10-04352	RAR Entrepreneurial Fund LTD, et al.	Chaitman LLPPro Se
16	10-04357	James Greiff	Dentons US LLP
17	10-04361	Harvey L. Werner Revocable Trust, et al.	Bernfeld, DeMatteo & Bernfeld, LLP
18	10-04362	Sage Associates, et al.	McDermott Will & Emery LLP
19	10-04367	Benjamin T. Heller	Chaitman LLP
20	10-04377	Carol Nelson, individually and as joint tenant, et al.	Chaitman LLP
21	10-04378	DOS BFS Family Partnership II, L.P., et al.	Westerman Ball Ederer Miller & Sharfstein LLP
22	10-04384	Lanx BM Investments, LLC, et al.	Baker & McKenzie LLPFisherBroyles
23	10-04390	Michael Mann, et al.	Dentons US LLP
24	10-04394	Frederic Z. Konigsberg, et al.	Bernfeld, DeMatteo & Bernfeld, LLPJohn E. Lawlor
25	10-04396	Edith A. Schur	Bernfeld, DeMatteo & Bernfeld, LLP
26	10-04397	Fern C. Palmer Revocable Trust Dtd 12/31/9, et al.	Chaitman LLP
27	10-04400	Sage Realty, et al.	McDermott Will & Emery LLP
28	10-04401	Rose Gindel Trust, et al.	Dentons US LLP
29	10-04415	The Estate of Barbara Berdon, et al.	Dentons US LLP
30	10-04417	The Lustig Family 1990 Trust, et al.	Binder & Schwartz LLP
31	10-04419	Katz Group Limited Partnership, a Wyoming limited partnership, et al.	Becker LLC
32	10-04428	Estate of Allen Meisels, et al.	Chaitman LLP
33	10-04429	Gary J. Korn, et al.	Golenbock Eiseman Assor Bell & Peskoe, LLP
34	10-04438	Estate of Seymour Epstein, et al.	Chaitman LLP
35	10-04446	Trust Dated 12/6/99 Walter and Eugenie Kissinger, et al.	Chaitman LLP
36	10-04463	Triangle Diversified Investments, et al.	Pro Se
37	10-04468	Ken-Wen Family Limited Partnership, et al.	Bernfeld, DeMatteo & Bernfeld, LLP
38	10-04469	Carol L. Kamenstein, individually and in her capacity as joint tenant	Chaitman LLP
39	10-04486	The Norma Shapiro Revocable Declaration of Trust Under Agreement Date	Dentons US LLP
40	10-04487	Robert Weintraub, et al.	Chaitman LLP
41	10-04489	Marlene Krauss	Chaitman LLP
42	10-04491	Elaine Dine Living Trust dated 5/12/06, et al.	Chaitman LLP
43	10-04492	Stuart Leventhal 2001 Irrevocable Trust, et al.	Gabor & Marotta LLC
44	10-04503	Judd Robbins	Chaitman LLP
45	10-04517	Radcliff Investments Limited, et al.	Clifford Chance U.S. LLP
46	10-04525	Susan Schemen Fradin Revocable Agreement of Trust, et al.	Willkie Farr & Gallagher LLP
47	10-04538	James B. Pinto Revocable Trust U/A dtd 12/1/03, et al.	Frejka PLLC
48	10-04539	The Gerald and Barbara Keller Family Trust, et al.	Chaitman LLP
49	10-04541	Kenneth W Perlman, et al.	Blank Rome LLPChaitman LLP
50	10-04545	Jerome Goodman, et al.	Chaitman LLP
51	10-04554	David Ivan Lustig	Binder & Schwartz LLP
52	10-04561	Jeffrey R. Werner 11/1/98 Trust, et al.	Bernfeld, DeMatteo & Bernfeld, LLP
53	10-04562	Robert F. Ferber	Chaitman LLP
54	10-04570	Jacob M. Dick Rev Living Trust DTD 4/6/01, et al.	Chaitman LLPPro Se
55	10-04573	Bruce Leventhal 2001 Irrevocable Trust, et al.	Lax & Neville, LLP
56	10-04592	Anthony E. Stefanelli	DelBello Donnellan Weingarten Wise & Wiederkehr LLP
57	10-04610	The Whitman Partnership, et al.	Chaitman LLP
58	10-04614	Robert S. Whitman	Chaitman LLP
59	10-04621	Donald A. Benjamin	Chaitman LLP
60	10-04631	151797 Canada Inc., Judith Pencer, Samuel Pencer, et al.	Eiseman, Levine, Lehrhaupt & Kakoyiannis, P.C.
61	10-04644	Russell L. Dusek	Chaitman LLP
62	10-04648	Peter D. Kamenstein	Chaitman LLP
63	10-04655	Jaffe Family Investment Partnership, et al.	Chaitman LLP

	APN	Case Name	Counsel
64	10-04658	Carol Nelson	Chaitman LLP
65	10-04667	David Gross, et al.	Pro Se
66	10-04669	Zieses Investment Partnership, et al.	Chaitman LLP
67	10-04672	Sidney Cole	Dentons US LLP
68	10-04702	S&L Partnership, a New York partnership, et al.	Dentons US LLP
69	10-04709	Andrew M. Goodman	Chaitman LLP
70	10-04718	The Jordan H. Kart Revocable Trust, et al.	Chaitman LLP
71	10-04728	Estate of Bruno L. Di Giulian, et al.	Chaitman LLP
72	10-04740	Robert Hirsch, as an individual, and as joint tenant, et al.	Chaitman LLP
73	10-04748	Mark Horowitz	Chaitman LLP
74	10-04749	Philip F. Palmedo	Chaitman LLP
75	10-04750	Samdia Family L.P., a Delaware Limited Partnership, et al.	Lax & Neville, LLP
76	10-04752	Kuntzman Family LLC, et al.	Chaitman LLP
77	10-04753	Carla Ginsburg	Chaitman LLP
78	10-04762	James M. Goodman	Chaitman LLP
79	10-04768	Placon2, William R. Cohen, et al.	Chaitman LLP
80	10-04798	Janet Jaffe, et al.	Chaitman LLP
81	10-04806	Kenneth M. Kohl, as an individual and as a joint tenant, et al.	Chaitman LLP
82	10-04809	Edyne Gordon NTC	Chaitman LLP
83	10-04818	Toby Harwood	Chaitman LLP
84	10-04823	Frank DiFazio, et al.	Chaitman LLP
85	10-04826	Boyer Palmer	Chaitman LLP
86	10-04837	Leslie Ehrlich f/k/a Leslie Harwood , et al.	Chaitman LLP
87	10-04861	Harold J. Hein	Dentons US LLP
88	10-04867	Estate of Steven I. Harnick, et al.	Chaitman LLP
89	10-04878	Lisa Beth Nissenbaum Trust, et al.	Chaitman LLP
90	10-04882	Laura E. Guggenheimer Cole	Dentons US LLP
91	10-04885	Trust Fund B U/W Edward F. Seligman F/B/O Nancy Atlas, et al.	Winston & Strawn LLP
92	10-04889	Estate of Robert Shervyn Savin, et al.	Chaitman LLP
93	10-04898	Helene Saren-Lawrence	Chaitman LLP
94	10-04905	Train Klan, a Partnership, et al.	Chaitman LLP
95	10-04912	Harry Smith Revocable Living Trust, et al.	Chaitman LLP
96	10-04914	Edyne Gordon	Chaitman LLP
97	10-04920	Glenhaven Limited, et al.	Chaitman LLP
98	10-04921	Stanley T. Miller	Dentons US LLP
99	10-04925	Alvin Gindel Revocable Trust, a Florida trust, et al.	Dentons US LLP
100	10-04931	Cantor, et al.	Winston & Strawn LLP
101	10-04954	Ruth Kahn	Lax & Neville, LLP
102	10-04956	D. M. Castelli	Chaitman LLP
103	10-04961	Sylvan Associates LLC f/k/a Sylvan Associates Ltd Partnership, et al.	Chaitman LLP
104	10-04979	James M. New Trust dtd 3/19/01, et al.	Chaitman LLP
105	10-04986	Sharon Knee	Pro Se
106	10-04991	Guiducci Family Limited Partnership, et al.	Chaitman LLP
107	10-04995	Trust U/Art Fourt O/W/O Israel Wilenitz, et al.	Chaitman LLP
108	10-05026	Walter Freshman Trust A, a Florida trust, et al.	Chaitman LLP
109	10-05037	Barbara L. Savin	Chaitman LLP
110	10-05048	Estate of Armand L. Greenhall, et al.	Law Office of Joseph F. KeenanLax & Neville, LLP
111	10-05068	D. Stone Industries, Inc. Profit Sharing Plan, et al.	Frejka PLLC
112	10-05079	Estate of James M. Goodman, et al.	Chaitman LLP
113	10-05083	The S. James Coppersmith Charitable Remainder Unitrust, et al.	Folkenflik & McGerity
114	10-05084	Daniel Stone	Frejka PLLC
115	10-05094	The Estate of Carolyn Miller, et al.	Bernfeld, DeMatteo & Bernfeld, LLP
116	10-05104	The Gloria Albert Sandler and Maurice Sandler Revocable Living Trust	Chaitman LLP
117	10-05116	Leonard J. Oguss Trust, et al.	Chaitman LLP
118	10-05118	Charlotte M. Marden	Pryor Cashman LLP
119	10-05124	The Lawrence J. Ryan and Theresa R. Ryan Revocable Living Trust, et al.	Chaitman LLP
120	10-05127	Atwood Management Profit Sharing Plan & Trust, etc., et al.	Chaitman LLP
121	10-05128	JABA Associates LP, et al.	Chaitman LLP
122	10-05130	Barbara Kotlikoff Harman	Chaitman LLP
123	10-05133	Boyer H. Palmer, individually, et al.	Chaitman LLP
124	10-05144	Estate of Bernard J. Kessel, et al.	Rosenberg Feldman Smith LLP
125	10-05150	Plafsky Family LLC Retirement Plan, Robert Plafsky, et al.	Chaitman LLP
126	10-05151	Palmer Family Trust, et al.	Chaitman LLP

	APN	Case Name	Counsel
127	10-05157	The Harnick Brothers Partnership, et al.	Chaitman LLP
128	10-05168	Bernard Marden Profit Sharing Plan, et al.	Pryor Cashman LLP
129	10-05169	Fairfield Pagma Associates, et al.	Lax & Neville, LLP
130	10-05184	Laura Ann Smith Revocable Living Trust, et al.	Chaitman LLP
131	10-05194	Bruce D. Pergament, et al.	Pryor Cashman LLP
132	10-05196	Whitman 1990 Trust U/A DTD 4/13/90, et al.	Chaitman LLP
133	10-05209	Lapin Children LLC	Dentons US LLP
134	10-05236	Toby T. Hobish, et al.	Dentons US LLP
135	10-05255	Stefanelli Investors Group, et al.	DelBello Donnellan Weingarten Wise & Wiederkehr LLP
136	10-05257	Edward A. Zraick, Jr., individually and as joint tenant, et al.	Hunton Andrews Kurth LLP
137	10-05259	Stanley I. Lehrer, et al.	Dentons US LLPPro Se
138	10-05285	Joan L. Fisher, both in her indvdl cap, etc., et al.	Yeskoo Hogan & Tamlyn LLP
139	10-05286	Legacy Capital Ltd., et al.	Stevens & Lee P.C.
140	10-05312	Doron Tavlin Trust U/A 2/4/91, et al.	Chaitman LLP
141	10-05377	Richard G. Eaton	Chaitman LLP
142	10-05380	Srione, LLC, an Idaho limited liability company, et al.	Law Offices of Stephen Goldstein Stillman & Associates
143	10-05384	Neil Reger Profit Sharing Keogh, et al.	Dentons US LLP
144	10-05394	Richard M. Glantz, et al.	Law Office of Richard E. Signorelli
145	10-05420	Gunther K. Unflat, et al.	Chaitman LLP
146	10-05435	Keith Schaffer, et al.	Chaitman LLP
147	10-05439	Avram J. Goldberg, individually and in his capacity as trust officer	Pryor Cashman LLP